

U.S. District Court Eastern District
of New York

Case No: 1:09 - cv - 1777- ENV-MDG

S.W., by and through his guardian, RENEE
MARQUIS-ABRAMS; R.E., T.G., AND J.L.,
by and through their next friend, MILDRED
GROSSO; S.B., by and through his guardian,
PATRICIA BALDWIN; L.J. AND J.G., by
and through their guardian, KEVIN
HENDRICKSON; J.B., C.B., and T.L.,

Plaintiffs,

vs.

CITY OF NEW YORK, a municipal corporation;
ADMINISTRATION FOR CHILDREN'S
SERVICES, f/k/a CHILD WELFARE
ADMINISTRATION; ST. JOSEPH SERVICES
FOR CHILDREN, INC., f/k/a CATHOLIC CHILD
CARE SOCIETY OF THE DIOCESE OF
BROOKLYN, INC., a New York corporation;
HEARTSHARE HUMAN SERVICES, f/k/a
CATHOLIC GUARDIAN SOCIETY OF THE
DIOCESE OF BROOKLYN, INC., a New York
Corporation; SCO FAMILY OF SERVICES, f/k/a
ST. CHRISTOPHER-OTILIE, a New York
Corporation,

Defendants

PLAINTIFFS' NOTICE OF EXPERT WITNESS DISCLOSURE
(LIABILITY AND DAMAGES)

Plaintiffs, S.W., by and through his guardian, RENEE MARQUIS-ABRAMS; R.E., T.G.,
and J.L., by and through their next friend, MILDRED DEL GROSSO; S.B. by and through his
guardian, KEVIN HENDRICKSON; J.B., C.B., and T.L., by and through the undersigned
counsel, and pursuant to Order of this Court dated June 11, 2010, discloses the liability expert
witnesses noted herein. Additionally, Plaintiffs understand this Court's Order of June 11, 2010
only applies to liability damage experts; however, in the spirit of full disclosure under Rule 26,

and because the City Defendants have previously been provided the names of some of Plaintiffs' damage experts, Plaintiffs also include a listing of damage experts herein. This disclosure shall not foreclose Plaintiffs' ability to add further damage experts prior to any such deadline set by this Court.

Plaintiffs respectfully disclose the following:

A. LIABILITY EXPERT WITNESSES

1. **Peg McCart Hess**
8500 Cambridge Woods Lane
Knoxville, TN 37923

Subject Matter: Record Review of documents related to each Plaintiff's foster care experience, including: each plaintiff's foster care and adoption files, licensing and adoption files for Judith Leekin (and other aliases used), and other documents relevant to Plaintiffs' cases. The report will include an analysis of whether the voluntary agencies and the City of New York (CWA, ACS) complied with applicable certification, foster care, and adoption policies, practices, and state, local and national standards of care, along with an analysis of whether failures to comply resulted in harm to Plaintiffs. The report will also include a review of systemic documents related to the structure and function of the New York City child welfare system and an analysis of whether the City of New York failed to adequately oversee the voluntary agencies and DAFCS.

2. **Golda Zimmerman**
711 East Genesee Street
Syracuse, NY 13210

Subject Matter: Record Review from the adoption perspective of each plaintiff's foster care, adoption files, UCRs, licensing files for Judith Leekin (and other aliases used) and other relevant documents to each Plaintiff and other children residing with Judith Leekin (and other aliases used) and other relevant documents relating to each of plaintiff including an analysis of applicable state, local and national adoption standards of care, adoption policies, procedures, practices, and failures thereof resulting in harm to Plaintiffs.

3. **Thomas L. Martin**
Crime Scene Forensics, LLC
P.O. Box 515
Red Hook, NY 12571

Subject Matter: Forensic identity verification, including fingerprint identification in New York State for the applicable time period.

4. **Benjamin Ortiz**
6 Linda Lane
Spring Valley, NY 10977

Subject Matter: U.S. Social Security System process for verification of social security numbers and access by City and State agencies for such purposes from 1984-1999.

5. **James E. Muller**
1546 The 12th Fairway
Wellington, FL 33414

Subject Matter: Identity verification, including background checks and social security number verification from 1980-2000.

6. **Steve Levy**
International Security Associates
301 East 62nd Street
New York, NY 10021

Subject Matter: Identity verification, including background checks and social security number verification from 1980-2000.

7. **Mark Testa**
School of Social Work
University of North Carolina at Chapel Hill
Tate-Turner-Kuralt Building
325 Pittsboro St., Campus Box 3550
I Hill, NC 25599-3550

Subject Matter: Analysis of policies, practices and systemic failures of the child welfare system in the City of New York (CWA and ACS) from 1984-1999 including failures related to the City's oversight of the voluntary agencies' certification of Judith Leekin (and aliases), as well as City oversight of the voluntary agencies' placement, care, and adoption process for Plaintiffs, which caused them harm.

8. **Henry Gunn**
100 Gerald Street
Beaufort, NC 28516

Subject Matter: Analysis of policies, practices and systemic failures of the child welfare system in the City of New York (CWA and ACS) from 1984-1999 including failures related to the City's oversight of the voluntary agencies' certification of Judith Leekin (and aliases), as well as City oversight of the voluntary agencies' placement, care, and adoption process for Plaintiffs, which caused them harm.

B. DAMAGES EXPERT WITNESSES

1. **Dr. Spencer Eth**
VA Medical Center
1201 N.W. 16th Street
Miami, FL 33125

Subject Matter: Past, current, and future psychiatric damage caused to each Plaintiff due to the abuse and neglect sustained while in the custody of Judith Leekin.

2. **Dr. Lenore Walker**
Nova Southeastern University
Center for Psychological Studies
3301 College Avenue
Ft. Lauderdale, FL 33314

Subject Matter: Past, current and future psychological impact of the abuse and neglect suffered by each Plaintiff while in the custody of Judith Leekin.

3. **Dr. F.A. Raffa**

Suite 200
17 South Osceola Avenue
Orlando, FL 32801

Subject Matter: Economic damages sustained by each Plaintiff as a result of the abuse and neglect suffered while in the custody of Judith Leekin.

4. **Dr. Paul Deutsch**

Windsormere Office Park
10 Windsormere Way
Oviedo, FL 32765

Subject Matter: Past and future needs of each Plaintiff based upon the impact of Judith Leekin's abuse and neglect producing physical, emotional, psychological, psychiatric, behavioral, educational and social damages.

5. **Dr. Nicholas Suite**

Suite 104
7900 N.W. 33rd Street
Davie, FL 33024

Subject Matter: Impact of Judith Leekin's abuse and neglect in producing scars, nutritional and other physical injury, resulting in damages to each Plaintiff while in the custody of Judith Leekin.

6. **Dr. Michelle Morrison**

10030 N.W. 6th Court
Pembroke Pines, FL 33024

Subject Matter: Impact of Judith Leekin's abuse and neglect in producing scars, nutritional and other physical deformities, resulting in damages to each Plaintiff while in the custody of Judith Leekin.

7. **Dr. Geoffrey Kanter**

Suite 201
1250 Tamiami Trail
Sarasota, FL 34239

Subject Matter: Past and future neurological impact upon each Plaintiff of abuse and neglect suffered while in the custody of Judith Leekin.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been furnished via U.S. Mail this 16 day of August, 2010 to the following

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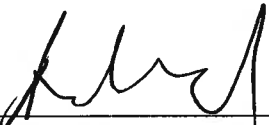
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Dated: 16 day of August, 2010.



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